

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

UNITED STATES OF AMERICA

V.

CRIMINAL NO. 4:16cr074-NBB

NATHANIEL BROWN, MD

**DEFENDANT NATHANIEL BROWN, MD'S MOTION TO CONTINUE SENTENCING**

COMES NOW, Defendant Nathaniel Brown, M.D. ("Brown"), by and through his counsel of record, pursuant to Rule 12 of the Federal Rules of Criminal Procedure, and hereby respectfully moves the Court for a continuance of the sentencing date in this matter on May 22, 2017. As grounds for this Motion, counsel submits as follows:

1. The Defendant pled guilty to one count of conspiracy to commit healthcare fraud in violation of 18 U.S.C. §§1347 and 1349. Dr. Brown appeared before this court, accepted responsibility and has remained on bond.

2. Defendant has received his Presentence Investigation Report. However, the undersigned counsel still believes it is prudent to complete the review of various discovery documents so that he can advise his clients regarding testimony, if applicable, for his sentencing hearing. We believe this is necessary in order to render effective assistance of counsel.

3. This Motion is not made to harass this Court.

4. Defendant respectfully requests the Court waive any supporting Memorandum of Law requirements.

5. Assistant United States Attorney Clay Dabbs has indicated that he has no objections to this motion.

WHEREFORE, the Defendant, Nathaniel Brown, by and through counsel, respectfully files this motion to continue the sentencing scheduled for May 22, 2017 until a date after July 4, 2017.

Respectfully submitted, this the 6<sup>th</sup> day of May, 2017.

Respectfully submitted,

NATHANIEL BROWN, MD

By: /s/ Terris C. Harris  
Terris C. Harris, J.D., LL.M (MSB # 99433)

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I, Terris C. Harris, Attorney for Defendant Nathaniel Brown, here certify that I electronically filed foregoing Notice of Appearance with the Clerk of the Court using the EFC system which sent notification of such filing to all counsel of record.

This Saturday, May 06, 2017.

/s/ Terris C. Harris

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TERRIS C. HARRIS